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ATTORNEY FOR DEFENDANT GIOVANNI BONDURANT

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 3:20-cr-00302-HZ

vs.

**DECLARATION OF
MATTHEW SCHINDLER IN
SUPPORT OF MOTION TO
CONTINUE TRIAL DATE**

GIOVANNI BONDURANT,
Defendant(s).

The undersigned, Matthew Schindler, as counsel for Mr. Bondurant does swear under penalty of perjury, the following is true:

1. I was appointed to represent the defendant under the Criminal Justice Act on August 27, 2020.
2. Mr. Bondurant is charged with felony assault on a federal law enforcement officer in violation of 18 U.S.C. § 111(a)(1).
3. He has been released to the supervision of United States Pretrial Services for the Western District of Washington.
4. Trial in this matter is currently set for October 27, 2020.

5. The government has provided initial discovery in this case consistent with the court's order. Counsel's review of that discovery has resulted in an additional request for discovery from the government I am in the process of drafting now. More time is necessary for the parties to complete discovery, negotiate a settlement, or prepare for motions and trial.
6. I have discussed with Mr. Bondurant his rights under the Speedy Trial Act. Specifically, we discussed his right to go to a jury trial within the time limitations contained in the Act. After that discussion, Mr. Bondurant agreed to waive his rights to a speedy trial consistent with the request continuance contained in this motion.
7. The government has no objection.

Respectfully submitted under penalty of perjury on October 16, 2020.

s/Matthew Schindler
Matthew A. Schindler, OSB#964190
Attorney for Giovanni Bondurant